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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

SAMANTHA JOHNSON

Plaintiff,

v.

TRANSUNION RENTAL SCREENING
SOLUTIONS, INC., and NATIONAL
ASSOCIATION OF INDEPENDENT
LANDLORDS, INC.,

Defendants.

Case No. 3:19-CV-00661-JR

**DECLARATION OF TIMOTHY J.
FRANSEN IN SUPPORT OF
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT**

I, Timothy J. Fransen, hereby declare:

1. I am the attorney representing defendant National Association of Independent Landlords, Inc. (“defendant”) in this case.
2. I was recently retained to represent defendant.
3. I have not had an opportunity to review the file and to prepare an appropriate first appearance.
4. Based on the proof of service on file with the court, defendant’s first appearance is currently due on July 18, 2019.
5. I have conferred with plaintiff’s counsel, and plaintiff does not oppose an extension of defendant’s time to respond to the complaint to August 16, 2019.

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MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

6. Accordingly, defendant requests that the court extend the deadline for defendant to file its response to the complaint to August 16, 2019.

7. This motion is made in good faith and not for any improper purpose.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT.

DATED: July 17, 2019

/s/ Timothy J. Fransen
Timothy J. Fransen

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **DECLARATION OF TIMOTHY J. FRANSEN IN SUPPORT OF UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** on the date indicated below by:

- ☐ mail with postage prepaid, deposited in the US mail at Portland, Oregon,
- ☐ hand delivery,
- ☐ facsimile transmission,
- ☐ overnight delivery,
- ☒ electronic filing notification.

If served by facsimile transmission, attached to this certificate is the printed confirmation of receipt of the document(s) generated by the transmitting machine. I further certify that said copy was placed in a sealed envelope delivered as indicated above and addressed to said attorney(s) at the address listed below:

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DATED: July 17, 2019

/s/ Timothy J. Fransen
Timothy J. Fransen